

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re: THE ROMAN CATHOLIC DIOCESE
OF SYRACUSE, NEW YORK,

Debtor.

Chapter 11
Case No.: 20-30663

**LIMITED OBJECTION TO DEBTOR'S MOTION FOR ENTRY OF AN ORDER
APPROVING DISCLOSURE STATEMENT IN SUPPORT OF AMENDED JOINT
CHAPTER 11 PLAN OF REORGANIZATION**

Edward J. Fintel hereby affirms as follows:

1. I am an attorney admitted to practice before this Court. I represent the Sisters of St. Francis of the Neumann Communities, formerly known as the Sisters of Third Franciscan Order of Syracuse (hereinafter "Sisters of St. Francis").

2. The Sisters of St. Francis are named as defendants in approximately eight (8) lawsuits presently pending in several counties in the central New York area (the "State Court Cases"). Most of the State Court Cases name Debtor herein as co-defendant – those that do not were commenced after the filing date of Debtor's chapter 11 case. The causes of action alleged in the State Court Cases against the Sisters of St. Francis consist of indirect agency claims based on, among other things, negligent hiring and failure to supervise. The State Court Cases do not allege any specific acts of abuse by any individual Sister.

3. The Amended Joint Chapter 11 Plan of Reorganization ("Plan")[Dkt. 1718] provides that as of the Effective Date¹ a Trust will be established to administer the Abuse Claims. The Trust shall assume all liability, if any, of the Protected Parties with respect to the Channeled Claims.

4. The Sisters of St. Francis are not listed on Exhibit "A" of the Plan since they are not under the direct control of the Debtor. Nonetheless, the Sisters of St. Francis believe that they should be included as Protected Parties entitled to the benefits of the Channeling Injunction. Any such inclusion is necessarily dependent on the Sisters of St. Francis making contribution to the Trust.

¹ Unless specifically defined, capitalized terms used herein shall have the same meaning ascribed to them in the Plan.

5. The Sisters of St. Francis believe that there are additional third-parties who are similarly situated (and are not DOS Entities).

6. The Disclosure Statement in Support of Amended Joint Chapter 11 Plan of Reorganization (“Disclosure Statement”)[Dkt. 1719]must describe the mechanism by which the Sisters of St. Francis and those similarly situated can attempt to settle their claims by contributing to the Trust while receiving the benefit of the Channeling Injunction, subject to applicable law.

WHEREFORE, the Sisters of St. Francis respectfully request that the Court disapprove the Disclosure Statement, and for such other and further relief as is just and appropriate.

Dated: March 22, 2024

/s/ Edward J. Fintel
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